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District Court

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for the Northern Mariana Islands
By _____
(Deputy Clerk)

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KUANYI CHEN
a/k/a PANGZI,

Defendant.

CRIMINAL CASE NO. **CR 12-00026**

INDICTMENT

Title 8, U.S.C. § 1324(a)(1)(A)(iv), (B)(i) – Encouraging Illegal Entry of Aliens for Financial Gain (Counts 1 – 5); Title 8, U.S.C. § 1324(a)(1)(A)(iii), (B)(i) – Harboring Aliens for Financial Gain (Counts 6 - 10); Title 8, U.S.C. § 1324(a)(1)(A)(ii), (B)(i) – Illegal Transportation of Aliens For Financial Gain (Counts 11 – 15).

THE GRAND JURY CHARGES:

COUNTS ONE - FIVE

Encouraging Illegal Entry of Aliens for Financial Gain

From on or about February 2012 to on or about August 24, 2012, on Saipan, in the District of the Northern Mariana Islands, the defendant Kuanyi CHEN, a/k/a PANGZI (“CHEN”), encouraged and induced the aliens named below by count to enter the United States in violation of the law, for purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that the aliens’ entry into the United States would be in

violation of the law.

Count One: Rongqin GAO

Count Two: Qingqing WANG

Count Three: Min GONG

Count Four: Yuze LI

Count Five: Shuang WEN

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), and (B)(i).

COUNTS SIX - TEN

Harboring Aliens for Financial Gain

From on or about February 2012 to on or about August 24, 2012, on Saipan, in the District of the Northern Mariana Islands, the defendant Kuanyi CHEN, a/k/a PANGZI knowing and in reckless disregard of the fact that the aliens named below by count had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection those aliens for the purpose of commercial advantage and private financial gain.

Count Six: Rongqin GAO

Count Seven: Qingqing WANG

Count Eight: Min GONG

Count Nine: Yuze LI

Count Ten: Shuang WEN

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), and (B)(i).

COUNTS ELEVEN – FIFTEEN

Illegal Transportation of Aliens for Financial Gain

From on or about February 2012 to on or about August 24, 2012, on Saipan, in the District of the Northern Mariana Islands, the defendant Kuanyi CHEN, a/k/a PANGZI knowing and in reckless disregard of the fact that the aliens named below by count, had come to, entered

1 and remained in the United States in violation of law, knowingly transported and moved those
2 aliens within the United States by means of transportation and otherwise in furtherance of such
3 violation of law, in order to help them remain in the United States illegally, for the purpose of
4 commercial advantage or private financial gain.

5 Count Eleven: Rongqin GAO

6 Count Twelve: Qingqing WANG

7 Count Thirteen: Min GONG

8 Count Fourteen: Yuze LI

9 Count Fifteen: Shuang WEN

10 All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), and (B)(i).

11 **ALLEGATION OF FORFEITURE**

12 All counts and allegations presented above in this Indictment are hereby realleged and
13 incorporated herein by reference for the purpose of alleging forfeiture to the United States
14 pursuant to Title 8, United States Code, Section 1324(b) and Title 18, United States Code,
15 Section 982(a)(6)(A).

16 Pursuant to Title 8, United States Code, Section 1324(b) and Title 18, United States
17 Code, Section 982(a)(6)(A), upon conviction of one or more of the offenses charged in Counts 1
18 through 15 above, Defendant Kuanyi CHEN, a/k/a PANGZI ("CHEN") shall forfeit to the
19 United States any and all conveyances, including any vehicle, used in the commission of the
20 offense of which CHEN is convicted, any and all property, real or personal, that constitutes, or is
21 derived from, or is traceable to, all the gross proceeds obtained directly or indirectly from the
22 commission of the offense of which CHEN is convicted, and any and all property, real or
23 personal, that was used to facilitate, or was intended to be used to facilitate the commission of
24

1 the offense of which CHEN is convicted, and any property traceable thereto.

2 If any of the above-described forfeitable property, as a result of any act or omission of
3 CHEN –

- 4 1. Cannot be located upon the exercise of due diligence;
- 5 2. Has been transferred or sold to, or deposited with, a third party;
- 6 3. Has been placed beyond the jurisdiction of the Court;
- 7 4. Has been substantially diminished in value; or
- 8 5. Has been commingled with other property which cannot be subdivided
9 without difficulty;

10 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to
11 seek forfeiture of any other property of CHEN's up to the value of the above-described
12 forfeitable property.

13 September 13, 2012.

14
15 A TRUE BILL.

16 Signature of foreperson redacted
17 pursuant to the Privacy Policy of the
18 Judicial Conference of the United States

19 Foreperson

20 ALICIA A.G. LIMTIACO
21 United States Attorney
22 Districts of Guam and the Northern Mariana Islands

23 By:

24 
RAMI S. BADAWY
Assistant U.S. Attorney